

# Exhibit D

## April Brown

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**From:** Rachael Lamkin [<mailto:rdl@lamkinipdefense.com>]  
**Sent:** Tuesday, April 11, 2017 5:15 PM  
**To:** Neal Massand <[nmassand@nilawfirm.com](mailto:nmassand@nilawfirm.com)>  
**Subject:** Re: Let's talk

Appreciate the follow through either way.

And apologies for the 3 extension applications filed. I thought a motion was required for a second extension. Should be all set now.

On Tue, Apr 11, 2017 at 3:12 PM, Neal Massand <[nmassand@nilawfirm.com](mailto:nmassand@nilawfirm.com)> wrote:

I will let my client know of your thoughts but suspect he won't be interested.

On Apr 11, 2017 5:07 PM, Rachael Lamkin <[rdl@lamkinipdefense.com](mailto:rdl@lamkinipdefense.com)> wrote:

Neal,

Attached please find the fees motion i mentioned yesterday, filed today in the RCDI case. The more i researched, the more widespread the conduct appears to be, and now i think all of Rothschild's cases may be filed under the same misrepresentations, and could potentially have to be refiled. At least if Judge Gilstrap adjudicates this motion.

I know you're focused on your case, but i suspect your client must take a broader view. I personally would like to see this motion adjudicated as i think it could result in important new law, but my client has a narrower view. Thus maybe we can horse-trade, your client agrees to dismiss Garmin, with prejudice, from your matter, and Garmin drops its motion in RCDI and forgoes any fees motion in this case.

I know this seems early and aggressive but i think here, the facts warrant this kind of quick compromise. Let me know if you want to discuss.

Best,

Rachael

Rachael Lamkin  
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Best,

Rachael

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